

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:23-cv-00243
)	
SOUTHERN BAPTIST CONVENTION;)	Judge Campbell
GUIDEPOST SOLUTIONS LLC; and)	Magistrate Judge Frensley
EXECUTIVE COMMITTEE OF THE)	Jury Demand
SOUTHERN BAPTIST CONVENTION,)	
)	
Defendants.)	

MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Johnny M. Hunt respectfully submits this Motion for Leave to File Under Seal the unredacted version of certain exhibits attached to Plaintiff's Memorandum in Support of Motion to Strike for Failure to Comply with Local and Federal Rules and Opposition to Motion to Expedite and for Emergency Relief, submitted by Plaintiff on April 10, 2024 (ECF Doc. No. 182) until such time as the Court adjudicates the issues.

On April 9, 2024, Jane Doe¹ filed a Motion for Protective Order to Proceed Pseudonymously and to Redact References to Her Name and Identifying Information in Public Filings (ECF Doc. No. 168). In response, and without conceding the propriety or the merits of the motion, Plaintiff files the instant Motion for Leave to File Under Seal.

For the foregoing reasons, and without conceding the merits of Jane Doe's Motion for Protective Order to Proceed Pseudonymously and to Redact References to Her Name and

¹ For purposes of this Motion, Plaintiff refers to the Complainant as Jane Doe. Plaintiff does not waive any arguments opposing the use of this or any other pseudonym.

Identifying Information in Public Filings, this Court should review the unredacted version of the exhibits under seal.

[SIGNATURE BLOCKS AND CERTIFICATE OF SERVICE TO FOLLOW]

Dated: April 10, 2024

Respectfully submitted,

s/ Andrew Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Motion for Leave to File Under Seal to be electronically filed with the Clerk of the Court on April 10, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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